

IN THE UNITED STATES MIDDLE
DISTRICT FOR ALABAMA, NORTHERN DIVISION
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Richard Wayne Wright, Sr., *

Plaintiff, Pro-Se. *

-VS- *

SYLVESTER NETTLES, et al. *

Defendants *

Case No:

2:05-CV-439-A

Motion For Filing Assault Charges
Restraining Orders And Protection Orders.

I Richard Wayne Wright, Sr., Comes
Now before this Honorable Court requesting
an investigation at which time [he] was
assaulted on November 23, 2005,
at approximately 7:15 A.M. by Sgt. S.
Carter, Officer Roosevelt Brown
(Co.I), officer Levy Richardson (Co.I)
and a Fourth (4th) officer was involved
in which I can not at this time
properly identify which aided Sgt.
S. Carter and officer R. Brown beat
inmate "Rod" which was pulled in
the lobby of Ten (10) dorm. Inmate
"Rod" was the inmate [they] ~~beat~~ ^{R.W.W.}
snatch in from the pouch of Ten
(10) dorm ~~lobby~~ ^{R.W.W.} because [he] and
others (inmates) were yelling through
the lock Entrance and exit door of
Ten (10) dorm lobby. Stating: "It ain't no

Reason For you'll to be doing that man like that..., that don't make no sense how [they] doing that man ..., stop kicking that man like that ..., etc. Inmate "Rod" and a few others (inmates) were at the door banging and yelling trying to get [them] to stop kicking me and hitting me with [their] hands and sticks (Can't say distinctively if he was the one doing all that yelling or to distinguish if he was banging on the outside door of Ten dorm, but I am certain [he] is the one [they] pull in, beat and put in the room with me, while I laid on the floor waiting). I am presently in isolation / infirmary (hid out to heal) but suffering injuries Face head, back, forearms, left leg calf, and both thighs. I have presently committed to a hunger strike in hopes of obtaining proper medical care before it's too late.

Issue II

Sgt. S. Carter did state after he

was interrupted (by the inmates) banging on the entrance and exit door of Ten (10) dorm) and (the beating he gave inmate "Rod") From attempting to break my back -- quoted: I'm not through with your ass!". Inmate Wright is in imminent danger of Facing Another Attack by Sgt. S. Carter, Officer R. Brown, Officer L. Richardson As of today the Forth (4th) Ofc. involved physically has not been properly identified. Lt Dowling and Sgt. C. Longmire are believe to be the orders givers of this Assault to be carry out on inmate Wright For having them in Federal Court (Case NO: 05-00439-CV-A-N) Richard Wayne Wright Sr. -vs- Sylvester Nettles et. al. Plaintiff has Faced enormous retaliation after Filing ^{R.W.W.} [his] First Complaint Richard Wayne Wright, Sr. -vs- Department of Correction Classification et. al. (Civil action NO: 99-D-338-N (dismissed without prejudice); Richard Wayne Wright, Sr. -vs- James Deloach, et. al. (Civil Action NO: 99-D-1405-N); After plaintiff Filed this second Complaint the Court entertained plaintiff Complaint until Oct 16, 2001 (evidentiary hearing). Plaintiff Complaint was dismissed as suggested to the (said) Court as mootness by defendant's Counselor(s).

Plaintiff had been induce prior to this evidentiary hearing with inappropriate, excessive mind altering drugs (psychotropic drugs). Due to defendants and defendants agents acts of manifested injustice Plaintiff was so disorient that could not even explain to the Federal Judge what was wrong with him. Defendants and their agents were able to keep plaintiff under such drug use clearly into the latter part of 2003. Plaintiff was extremely inculcated and incumbent with a label of mental health illness. (See motion For Mental examination as an Attach motion). Plaintiff Filed other complaints after the two (2) stated above in which had/has direct barring (retaliation) on plaintiff present liberty interest and Future consideration For earlier release From prison. Courts rule in defendants Favor in all instances (See Richard Wayne Wright, Sr. - VS - Gwendolyn Babers, et. al. (Case No CV-05-618-TMH); Richard Wayne Wright, Sr. - VS - state of Alabama (Case No: CR-03-0931) (Appeal From Bullock Circuit Court (CCV-04-12.60)); Richard Wayne Wright, Sr. - VS - Department of Correction Classification, et. al. (Civil Action NO: 99-D-338-N (dismissed without prejudice). Lt. J Dowling Attempted to initiated and Assault on Monday

21st of November 2005 during Vaccination For Hepatitis (B). Inmate Wright Knew to remain silent during Lt. J. Dowling interrogation to avoid any physical Confrontation while ~~the~~ operates in ~~this~~ sense of Authority. Plaintiff had remember the isolated room/Hall Lt. J. Dowling took ~~him~~ to in April 26, 2005, when ~~the~~ refused a T.B. Skin Test. Then ~~the~~ was engaged with Mr. Bruton prior to this For insisting on protective Custody (P.C.) From inmate Jones which had been separated in the Segregation Unit at Bullock Correction Facility (B.C.F.) And was Force back Around this inmate. As well AS Force to be transferred with him the same day, At the same time, on the same van, to the same place. These defendants at Ventress Correctional Facility (V.C.F.) has conspired with those of (B.C.F.) to inflict more mental punishment upon ~~him~~ plaintiff now to include more physical pain through this newly design Assault. Defendants At Kilby Correctional Facility (K.C.F.) design And Administered the sceme to block plaintiff Wright litigation portion/evidentiary hearing

Case Wright vs. DeLoach 99-D-1405-N) defense. They were successful at that time in accomplishing [their] objective, yet they were not complete in [their] mission And now are making many attempts to take plaintiff life, even through the use of psychotropic drugs or dementia by the excessive use of their drugs. This disease has a life expectancy of six (6) to eight (8) years after onset. The disease illnesses are similar to that of Alzheimer's. Alabama currently has 52,800 dementia and will have almost 70,000 victims by the year 2010. Plaintiff wonders are these defendants neglect in providing [him] with proper medical treatment apart of [their] death approach upon [him] (Dementia ~~was~~^{R.W.W.} titles § 20-50-70 through § 20-50-74). Lt. Dowling has influence officer Abercrombie (acting Law library Clerk) and Sgt. Carter (officer Abercrombie immediate Supervisor) to harass plaintiff tremendously these past six (6) to five (5) weeks upon plaintiff visit to the law library and use of the equipment/ supplies in the law library. Now I've not yield in the negative way they expect so now I get straight out

Assaulted in ten (10) dorm lobby, in the midst of many inmates on November 23, 2005. Due to the other inmate "Rod" [they] Assaulted and approximately the same time Sgt. Carter has emphasize he's not Finish with me.

Sgt. Carter And one of [his] Accomplice ofc. L. Richardson are permitted to visit this isolation cell in the infirmary (hid away until my wounds heal) to harrass and mock plaintiff in hopes to relay some type message. Due to Sgt. Carter rage or burst of

Anger on November 23, 2005 [his] Finish Acts (that day) [they] Assaulted [me] where [he] grab [me] on the Front portion of my pants and gave [me] several hard jerks (while my hands were still cuff behind my back) greatfully the belt buckle and buttons pop aloose before my back did (and now I still lay in the infirmary (await) proper medical treatment and diagnosis by medical doctor(s) not involve in this law suit or has the interest of these defendants Further neglecting plaintiff needed medical attention. Plaintiff wonders is Sgt. Carter going to conclude this, this is not just going to go away and lanch another all out Attack upon

plaintiff. It appears the only real human form of help I'm going to receive is that from this Honorable Court if it arrives in time.

Lastly, plaintiff seeks immediate protection and earnestly ask that this Honorable Court notify Warden J.C. Giles at this Facility (V.C.F.). Plaintiff has awaited a response from the Bourber County District Attorney, or the Sheriff of Bourber County, Department of Correction Investigation & Intelligence division (investigator). Plaintiff ask that this Honorable Court send an Agent for a complete and thorough investigation concerning the attack plaintiff faced physically at the hands of the D.O.C officials on November 23, 2005 in Ten (10) dorm lobby along with another inmate (that) tried to discourage the assault [I] was facing and as a result [he] faced an assault as well. Plaintiff have included the petition [he] mailed to the District Attorney office of Bourber County and others mention in (said) petition (see Exhibit (A)) If this motion plaintiff submitted to this Honorable Court is not in its proper form plaintiff ask that this (said) motion "Motion For Filing Assault Charges

Restraining orders and protection orders" be construed into its proper Form, Pro-Se litigant.

Done this the ^{R.W.W} 13th day of December 2005.

Respectfully Submitted,

Richard W. Wright Sr.
Richard Wayne Wright Sr.
18 USC 1746
Petitioner, Pro-Se.

Plaintiff's Address

Richard Wayne Wright Sr. #187140
Ventress Correctional Facility
R.W.W. ~~Room 103 For the Prisoner~~
Infirmary Room # 103
Post office Box 767
Clayton Alabama 36016

CERTIFICATE OF SERVICE

This is certify that I Richard Wayne Wright, Sr., Plaintiff, Pro-Se. in the above encaptioned motion And certify I have sent this motion to the Clerk of this Court And earnestly ASK due to plaintiff

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indigent status that this Honorable Court Forward a copy of this (said) motion "motion For physical Examination" to defendants Counsel(s) which are as Following;

Troy King (Attorney General)
State Bar # ASB - 5949-5615
Steven M. Sirmon
(Assistant Attorney General)
Alabama Board Pardon And Paroles
Post Office Box 302405
Montgomery, Alabama 36130

David B. Block
William R. Lunsford
Balch & Bingham LLP
Post Office Box 18668
Huntsville Alabama 35804-8668

Kim T. Thomas
Gregg M. Biggs
Alabama Department of Correction
Legal Division
301 Ripley street
Montgomery, Alabama 36130

by placing this motion in the United States Mail Box at Ventress Correctional Facility (Ventress Legal Mail Box) by hand delivery to

the officer on duty with one (1)
First Class postage stamp prepaid
And the additional postage needed
to be Furnish by the proper D.O.C.
officials) at (V.C.F.) and properly
address this on the 13th day of
December, 2005.

Done this the 13th day of
December, 2005.

RespectFully Submitted,

Richard W. Wright, Jr.
Richard Wayne Wright, Jr. #187140
Plaintiff, Pro-Se.,
28 USC 1746